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October 15, 2008

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State University, San Luis
Obispo

Philip Isenberg, Chair
Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

Subject: California State Board of Food and Agriculture Comments on the Delta
Vision Strategic Plan (Fifth Staff Draft)

Dear Chairman Isenberg:

The California State Board of Food and Agriculture has commented on previous drafts of the Delta Vision Strategic Plan. We are disappointed that our major comments have been either overlooked or ignored. As a result of this observation, the state board must advise the Delta Vision Committee as well as the Governor against implementation of the strategic plan as proposed in the fifth draft. Our hope is that the Blue Ribbon Task Force will order the necessary changes that would warrant our support.

The Delta is the hub of California's water delivery system as much as California's agricultural industry is to the food security of California and the nation. The co-equal goal outlined within the strategic plan strives for the restoration of the Delta ecosystems and creating a reliable water supply for California. As a guiding principle, we hope that the Task Force will recognize in the strategic plan document the value of agriculture to the environment, public health and security – as a strategic resource of the state and nation. As such, decisions that impact the ability to produce an affordable and reliable food supply should be weighed accordingly. Simply put, water and agriculture are a linked resource.

Despite our comments, the Delta Vision Strategic Plan continues to treat stakeholders differently as it wavers between extremes as a "high-level" document while prescribing specific actions against agriculture in areas such as water use efficiency, the integrity of water rights and governance that do not apply to other stakeholders. The draft strategic plan lacks technical and scientific analysis gauging the impact and interaction of its recommendations. Without a foundation in science and technical considerations the Delta strategic plan will prevent the Delta Vision Committee from making adequately informed decisions.



The draft strategic plan hinges on alteration of historical water rights without assurances of proper representation in governance bodies, without a measurement of economic impacts to farmers and without scientific measures to assure that redirected water will be beneficially used in the environment. As a vision and strategy this does not break California from the water war mindset that has dominated state water policy. As a guiding principle, reasonable use and public trust justification for policy implementation should target the long-term viability of the state (protecting valuable resources) and not the political/social demands of a narrow period of time. We can, as outlined within your introduction to the strategic plan, create a healthier more sustainable future for the Delta and our state through hard work and good will by all parties. Agriculture is partner in this process for the Delta and a reliable water supply for the state.

As a guiding principle, water use efficiency must be seen in context of each stakeholder sector and not in the abstract with conventional wisdom as its guide. Every water use sector needs to be as efficient as possible and agriculture is no exception. The California Department of Water Resource's water plan update identifies where water use efficiency can be best accomplished and notes agriculture's achievements.

The strategic plan's misguided establishment of use benchmarks based upon 2006 – 2009 utilization; recommendations for matching water volume with crop requirements as though natural conditions are static; and evolving acceptable practices of diverting surface water from irrigated agriculture with a determination on reasonable use – are all examples of policy recommendations determined in the abstract. Examples of real factors in agriculture not considered in the strategic plan include extreme weather conditions (heat/freeze) the ratio of water use determined by geographic/soil conditions; and the interaction of various strategic plan recommendations given uncertain hydrological factors. Overall, agricultural and environmental use sectors have diverse needs and water use efficiency recommendations must take these factors into account.

Our board wishes to emphasize the importance of scientific and technical analysis on the Delta Vision Strategic Plan. Many recommendations included in the strategic plan are not supported by technical or scientific data. Understanding the specific and possible impacts of proposed policy recommendations is important to decision-making before implementation.

The above remarks are submitted in response to the Fifth Staff Draft of the Delta Vision Strategic Plan at the recommendation of the board's committee on the Delta Vision. It is expected that these comments will be ratified at our next regular board meeting on October 29, 2008.

Thank you for the opportunity to contribute to this process. We hope that the guiding principles we discussed will be included in the final report and considered before policy implementation occurs. California is a dynamic state with a variety of stakeholders, building consensus on the Delta and water policy is essential to the viability of our state's social, environmental and economic infrastructure.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alfred Montna", with a stylized flourish at the end.

Alfred Montna
President

cc: The Honorable Arnold Schwarzenegger, Governor
Mr. Mike Chrisman, Secretary, California Resource Agency
Mr. A.G. Kawamura, Secretary, California Department of Food and Agriculture
Mr. Lester Snow, Director, California Department of Water Resources